

National ILEC Performance Measurements and Standards

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WorldCom: A National Provider

- ❑ WorldCom recently launched two new service offerings that are dependent on the availability and timely delivery of UNEs from the ILECs:
 - MCI's Neighborhood Offering: Nationwide Local and Long Distance
 - UNE-P for local
 - WorldCom's OnNet DSL: Service to Businesses and ISPs in over 30 markets
 - xDSL loops
 - Line Sharing
 - Line Splitting
- ❑ As a national provider, WorldCom would prefer national measures and standards; however, WorldCom does not support minimal national measures that supplant the state measures—federal measurements should serve as a floor that the states are free to go beyond.
- ❑ The FCC should develop national measures and standards that coexist with the state measures.

State Metrics Plans: Joint Effort Between State, ILEC and CLECs

- ILECs have not shown harms of state reporting requirements; reporting costs are minimal compared to billions CLECs pay for resale, UNEs, and interconnection.
 - ILECs want to simplify metrics but advocate elaborate statistical mitigation techniques that dilute remedies.
 - Complaints by ILECs of reports without activity are misleading. The absence of data is a function of ILEC reporting of retail performance for parity comparisons.
 - Proposed measures in NPRM omit key metrics.
- State Regulators routinely weigh benefits versus burdens of ILEC reporting and favor maintaining the existing state measures.



Debunking The Rhetoric

- States, CLECs, ILECs are working toward the development of uniform plans within ILEC regions.
 - Verizon: VZ-South states poised to opt into NY metrics for uniformity, VZ-West states likely to follow CA.
 - Qwest: metrics virtually identical through ROC effort throughout states.
 - SBC: legacy company metrics virtually the same as a result of joint six-month reviews.
 - BellSouth: GA measures becoming model for rest of region.
- Refinement of metrics more appropriate for state collaboratives.
 - FCC has left updates to merger metrics to states.



ILECs Ignore Crucial Measures, Disaggregation

- ❑ ILEC short-list proposals show major differences among incumbents on best national measures.
- ❑ Big Question: Why Should the foxes have a vote at all on how to best secure the hen house?
 - Only have metrics and remedies regulatory proceedings because of the incentive and capability to thwart competitive growth.
 - ILECs promote “outcome” (provisioning/maintenance) metrics while blocking CLECs from getting into the race at all or by retaining retail customers through ordering process barriers.
- ❑ ILECs propose no change control metrics, which nearly all states have adopted. Few metrics on order status notifiers, which has been a national problem.
- ❑ ILECs all proposed measures that are not necessarily the ones that are most helpful for gauging performance (i.e., System Availability versus PreOrder Response Time; Billing Accuracy v. Billing Timeliness.)
- ❑ ILECs propose to jumble all products together with virtually no disaggregation in some cases, and clearly no geographic disaggregation at all. SBC suggests no UNE-P inclusion at all; VZ would not include DS1 and DS3 loops.

FCC Should Guide, Not Preempt

- ☐ FCC should develop model metrics to help states understand the best business rules, appropriate exclusions, benchmarks providing a reasonable opportunity to compete.
- ☐ FCC expertise in developing effective metrics and remedies would be beneficial to states that have low staff resources or where CLECs participation is minimal.
- ☐ FCC guidance on the “gray” areas of metrics (Customer Not Ready/No Access/Found OK/Test OK/No Trouble Found/CPE exclusions) could provide best practices to ensure exclusions are accurate. In some cases, this may involve operational change forums (CNR/NA verification procedures) or audit templates to look at coding accuracy and retraining for errors in trouble report exclusions.
- ☐ FCC could also help guide on statistical methodologies or in setting more benchmarks (even could base on past performance and updated for improvements in performance) to avoid statistical complexities.

WorldCom's Model Metrics

- ❑ WCOM's proposed measures include input from most major CLECs to ensure coverage of service delivery methods and methodologies and reflect competitors actual experience in the marketplace.

- ❑ WorldCom metrics have counterparts in nearly all ILEC regions:

PREORDERING

- Percent System Availability (1)
- Query Response Timeliness (Percent Rejects/TimeOuts) (2)

CHANGE CONTROL

- Percent Change Management Notices/Documents Sent on Time (Average Delay Days) (3)
- Percent Software Error Correction in X Days (4)



WorldCom Model Metrics (cont'd)...

- ❑ WorldCom metrics with counterparts in most states (cont'd):

ORDERING/ORDER STATUS

- Percent Order Accuracy (6)
- Percent Flow Through (7)
- Percent On-Time LSRC/FOC (8)
- Percent On-Time Reject Notices (9)
- Percent Jeopardy Notices (10)
- Percent On-Time Completion Notices (PCN, BCN or both) (11)
- Average Completion Interval (13)
- Percent Orders Completed on Time (14)

PROVISIONING

- Percent Timely Coordinated Conversions (15)
- Average ILEC Caused Provisioning Outage Duration (Percent Outages) (16)
- Percent of Orders Held > X Days (17)
- Troubles Within X Days of Install/Order Activity (18)

MAINTENANCE

- Mean Time to Restore (19)
- Trouble Report Rate (20)
- Percent Repeat Trouble Report Rate (21)
- Percent Customer Troubles Resolved in Estimated Time (22)

WorldCom Model Metrics (cont'd)...

- ❑ WorldCom metrics with counterparts in most state plans (cont'd):

NETWORK PERFORMANCE

- Percent Trunk Blockage (23)
- Percent Timely Collocation Responses (24)
- Percent Collocation/Augment Due Dates Met/Average Interval (25)
- NXX/LRN Loaded by LERG Effective Date (26)

BILLING

- Timeliness of Daily Usage Feed (27)
- Timeliness of Carrier Invoice (28)

- ❑ WorldCom additional metrics reflecting current business issues gaining state momentum):

- CLEC Center Responses in X Days (5) (Likely to be recommended by staff in GA Six-Month Review)
- Timely Loss Notification (12) (Only in SBC Ameritech region now, but under discussion in most other ILEC territories)
- Billing Error Correction Requests Acknowledged/Resolved in X Days (29) (Versions in VZ-NY and BST-FL metric plans).

Federal Enforcement Plan Needed to Deter Poor Performance

☐ National Measures Enable Swift Enforcement

- WorldCom proposes a two-prong process: Expedited NAL and Expedited 208 Process
- WorldCom also proposes FCC endorsement of a model remedy plan for states to adopt

☐ Expedited NAL Process

- FCC issues NAL and Order to Show Cause.
- Triggered by missed metric for 3 consecutive months or 3 out of 6 months.
- Order to show cause provides ILEC with opportunity to be heard.
- ILEC has 15 days to respond; carriers have 7 days to reply.
- ILEC arguments that FCC may only enforce payments to the US Treasury by going to district court is a process used only if the ILEC refuses to make payment and does not limit in the FCC's authority to issue a NAL.

☐ Expedited 208 Process

- CLEC would file a form complaint.
- ILEC would have 10 days to answer; FCC resolution in 30 days.
- Identification of the missed metric would create rebuttable presumption that a violation of the Commission's rules has occurred.
- Expedited damages phase follows liability phase.

